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PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO FEDERAL DEFENDANTS' MOTION TO DISMISS Perkins Coie LLP 1120 N.W. Couch Street, 10th Floor Portland, OR 97209-4128 Phone: 503.727.2000

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UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

CHRISTOPHER WISE, MICHAEL MARTINEZ, CHRISTOPHER DURKEE, and SAVANNAH GUEST, individuals,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal corporation; OFFICER STEPHEN B. PETTEY, in his individual capacity; JOHN DOES 1-60, individual and supervisory officers of Portland Police Bureau; U.S. DEPARTMENT OF HOMELAND SECURITY; U.S. MARSHALS SERVICE; JOHN DOES 61-100, individual and supervisory officers of the federal government,

Defendants.

Case No. 3:20-cv-01193-IM

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO FEDERAL DEFENDANTS' MOTION TO DISMISS AGENCY AND OFFICIAL CAPACITY CLAIMS

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO FEDERAL DEFENDANTS' MOTION TO DISMISS

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LOCAL RULE 7-1 CERTIFICATION

Pursuant to LR 7-1(a), plaintiffs Christopher Wise, Michael Martinez, Christopher Durkee, and Savannah Guest ("Plaintiffs") certify that counsel for Plaintiffs has conferred in good faith with counsel for Defendants U.S. Department of Homeland Security, U.S. Marshals Service, and John Does 61-100 ("Federal Defendants") regarding the relief requested in this Motion, and that Federal Defendants do not oppose the Motion.

MOTION

On October 20, 2020 Federal Defendants filed and served a Motion to Dismiss Agency and Official Capacity Claims ("Motion"). Per LR 7-1(e)(1), Plaintiffs' Response to the Motion is due November 3, 2020. Pursuant to Fed. R. Civ. P. 6(b)(1), Plaintiffs hereby request an extension of 14 days to file their Response to the Motion, moving the deadline out to November 17, 2020.

DATED: October 29, 2020 PERKINS COIE LLP

By: /s/ Nathan Morales

Rian Peck, OSB No. 144012 Thomas R. Johnson, OSB No. 010645 Misha Isaak, OSB No. 086430 Nathan Morales, OSB No. 145763 Shane Grannum, pro hac vice Sarah Mahmood, pro hac vice pending Zachary Watterson, pro hac vice PERKINS COIE LLP

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1- PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO FEDERAL DEFENDANTS' MOTION TO DISMISS

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